

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA,
NORTHERN DIVISION

CHARLES PEARSON,) Case No.: 2:06-CV-828
Plaintiff,)
vs.) REQUESTED VOIR DIRE BY
K.L. BYRD, C.G. GRUHN, et. al.,) DEFENDANTS BYRD, HARRISON,
Defendant) REARDON and CORKRAN
)
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)
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)

COME NOW the defendants, Byrd, Harrison, Reardon, and Corkran by and through undersigned counsel, and request that the following questions be asked of the jury panel prior to jury selection in the above case.

(1) Has anyone had a family member that had a problem which you attribute to drugs or alcohol?

If yes, please explain:

(2) Has anyone ever received or applied for any of the following benefits?

Veteran's benefits, social security benefits, welfare benefits, A.F.D.C. (Aid to families with dependent children), unemployment benefits or compensation, basic education grant, C.E.T.A. benefits, educational scholarships, workers' compensation benefits, any other type of federal, state or county benefits.

(3) Is anyone an employee of the U.S. Government?

If yes, what position?

(4) Raise your hand if you are unemployed or retired.

(5) Has anyone ever served on a trial jury?

If yes, when, where and how many times?

Was your jury service criminal, civil or both?

What was the outcome?

(6) Has anyone ever served on a grand jury?

If yes, when, where and how many times?

(7) Are any of you or members of your family involved in any action currently pending in court?

If yes, where and for what type of action, civil or criminal?

(8) Have you or any member of your family ever been arrested or charged with a criminal offense? If yes, please give:

Person's relationship to you:

Offense in which person was charged:

Year when arrest or charge was made:

Outcome of arrest or charge:

(9) Does anybody live or work in the City of Montgomery?

(10) Has anybody ever been investigated for committing a crime or been questioned by law enforcement authorities in an investigation of a crime?

(11) Have you or any member of your family ever been a victim of a crime?

If yes, please give:

Person's relationship to you:

Describe incident:

(12) Have you or any member of your family ever sued or been sued by anyone in court? If yes, please give:

Describe lawsuit:

Give outcome:

(13) Have you or any member of your family ever filed a claim of discrimination?

If yes, please:

Describe claim:

Give outcome:

(14) Have you or any member of your family ever had a claim of discrimination filed against you, him or her? If yes, please:

Describe claim:

Give outcome:

(15) Have you or any member of your family consulted with a lawyer in the last five years? If yes, for what reason?

(16) Have you ever appeared as a witness before a grand jury?

If yes, where and when?

(17) Has anyone appeared as a witness in a criminal or civil case?

If yes, when, where and for which type:

(18) Has anyone ever given a deposition (a statement under oath) in a legal proceeding?

(19) Has anyone ever served in the military?

What branch?

What was your main occupation while in the service?

What was your highest rank?

How long did you serve?

What is the nature of your discharge? Was it Honorable, Dishonorable, or Less than honorable?

(20) Has anyone ever worked in a law enforcement related job, such as police, sheriff, trooper, prison guard or military police?

If yes, what type job?

(21) Does anyone have any bumper stickers on their vehicle and/or their spouse's vehicle?

If yes, what do they say?

(22) Is anyone a member of any organization which advocates for civil liberties or for victim's rights?

What is the name of the organization?

(23) Are you or any member of your family a member of any group which encourages strict enforcement of criminal laws or modification of our present laws such as Mothers Against Drunk Driving (MADD), Citizens Against Violence (CAV), etc.?

(24) Have you or one of your close family members been tased by a law enforcement officer or another individual?

(25) Is anyone a Mason, or affiliated with the Masonic Organization?

(26) Does anyone smoke?

If yes, do you need to smoke more often than every two hours?

(27) Has anyone ever filed a claim for damages against a municipality or county? If so, against which city or county did you file it, and what was the nature of your claim?

(28) Has anyone ever been arrested or detained by the Montgomery Police Department for anything besides a routine traffic violation?

(29) Have you or any member or your family or close friends ever had what you would consider a negative experience with the City of Montgomery Police Department or officials of the Police Department?

a. If so, please describe that experience.

b. If you recall, identify the official involved.

(30) Have you or any member of your family or close friends had what you would consider a negative experience or sued the City of Montgomery or its representatives or employees?

- a. If so, please describe that experience.
- b. If you recall, identify the representatives or employees involved.

Respectfully submitted,

/s/ Wallace D. Mills
Wallace D. Mills (MIL 090)
Attorney for Defendants

OF COUNSEL:

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CERTIFICATE OF SERVICE

I hereby certify that on the 20th day of June, 2008, I electronically filed the foregoing with the Clerk of the court using the CM/ECF system which will send notification of such filing to the following parties or counsel:

Charley Anthony Tudisco
Scott Wayne Gosnell
Tudisco & Gosnell, LLC
1901 Cogswell Avenue, Ste. 2
Pell City, AL 35125

and I hereby certify that I have also mailed by United States Postal Service the document to the above-named non-CM/ECF participants:

Charles Pearson
AIS #182691 (HO1-086A)
St. Clair Correctional Facility
1000 St. Clair Road
Springville, AL 35146-5582

/s/Wallace D. Mills
Of Counsel

